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OCT 17 2019

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

DEPUTY

UNITED STATES OF AMERICA

v.

WENBO WANG,**Defendant.****CRIMINAL NO.****19-493**

**(Use of Interstate Facilities to Promote
Enterprise involving Prostitution Offense,
18 U.S.C. § 1952(a)(3); Aiding & Abetting,
18 U.S.C. §2)**

INFORMATION**COUNT ONE****(Use of Interstate Facilities to Promote Enterprise involving Prostitution Offense)**

The United States Attorney for the District of Maryland charges that:

Beginning in at the latest January 2017 and continuing through January 2019, exact dates being unknown to the Grand Jury, in the District of Maryland, the defendant,

WENBO WANG,

used, and aided and abetted the use of, a facility in interstate and foreign commerce with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, that is, a business enterprise involving prostitution offenses in violation of the laws of the State of Maryland, to include MD Code, Criminal Law, §§ 11-303, 11-304, and of the United States, and thereafter performed and attempted to perform an act that promoted, managed, established, carried on and facilitated the promotion, management, establishment and carrying on of said unlawful activity.

18 U.S.C. § 1952(a)(3)
18 U.S.C. § 2

10-17-19
DATE

Robert K. Hur / RKH
Robert K. Hur
United States Attorney